

APR 15 1 03 PM '01

CHIEF CLERK'S OFFICE

LaTessa Salone, Janet DeMarinis, Andrea Raila,)
Pat Quinn and the petition signers of the)
Customer Utility Convention)
Petitioners,)
)
Petition to the Members of the Illinois Commerce)
Commission Pursuant to Section 5-145(b) of the)
Illinois Administrative Procedure Act.)

ICC Docket No. 01-0321

PETITION FOR LEAVE TO INTERVENE

NOW COME the PEOPLE OF COOK COUNTY, by and through
RICHARD A. DEVINE, State's Attorney of Cook County, pursuant to the Rules of
Practice of the Illinois Commerce Commission, 83 Ill. Admin. Code, Section 200.200,
and pray for leave to intervene and be made a party in the above-captioned proceeding.
In support of this Petition, the PEOPLE OF COOK COUNTY state the following:

1. That the People of Cook County are utility consumers within the
State of Illinois and the State's Attorney represents these consumers in order to assure
their utility rates are reasonable and to protect the public interest.
2. That the People of Cook County, as utility consumers, will be
affected by any order entered by the Commission in this proceeding and that the Cook
County State's Attorney's Office is accordingly interested in this proceeding.
3. The State's Attorney has the duty to represent the interests of the
People of Cook County and has a substantial interest in ensuring that the Order entered in
the instant proceeding is consistent with the terms of the Public Utilities Act and sound
public policy.

WHEREFORE, for the above-stated reasons, the Proposed Intervenor prays that leave to intervene be granted by this Commission and that the PEOPLE OF COOK COUNTY be made a party to the above-captioned proceeding.

Respectfully submitted,

RICHARD A. DEVINE
State's Attorney of Cook County

Dated: May 14, 2001

By: 

Leijuana Doss
Assistant State's Attorney
Environment and Energy Division

MARIE SPICUZZA
Assistant State's Attorney
Deputy Supervisor, Environment and Energy Division

LEIJUANA DOSS
Assistant State's Attorney
Environment and Energy Division
69 West Washington, Suite 700
Chicago, Illinois 60602
(312) 603-8625

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION

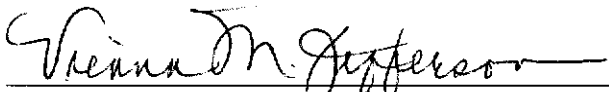
NOW COMES LEIJUANA DOSS, who, after first being sworn, deposes
and says:

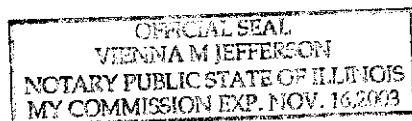
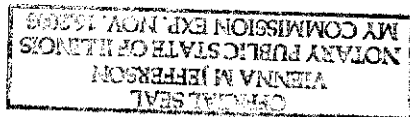
1. That she is an Assistant State's Attorney in Cook County assigned
to represent the People of Cook County in any proceedings in connection with the
attached PETITION FOR LEAVE TO INTERVENE; and

2. That she has read the attached PETITION FOR LEAVE TO
INTERVENE and that the facts alleged therein are true and correct to the best of her
knowledge and belief.


LEIJUANA DOSS

SUBSCRIBED AND SWORN to
before me this 14th day
of May, 2001.


Notary Public



**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

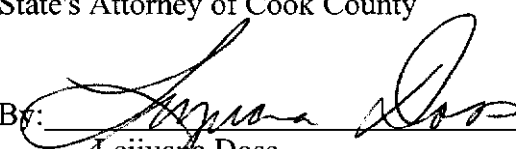
LaTessa Salone, Janet DeMarinis, Andrea Raila,)	
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Customer Utility Convention)	ICC Docket No. 01-0321
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NOTICE OF FILING

TO: See Attached Service List.

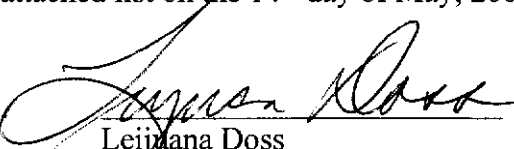
PLEASE TAKE NOTICE that on this date, May 14, 2001, we have filed with the Chief Clerk of the Illinois Commerce Commission the enclosed Petition For Leave To Intervene in the above-captioned docket.

RICHARD A. DEVINE
State's Attorney of Cook County

By: 
Lejuana Doss
Assistant State's Attorney
Environment and Energy Division
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CERTIFICATE OF SERVICE

I, **LEIJUANA DOSS**, hereby certify that a copy of the enclosed Petition For Leave To Intervene was served on all parties on the attached list on the 14th day of May, 2001 by hand delivery or U.S. first class mail prepaid.


Lejuana Doss
Assistant State's Attorney

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ICC DOCKET NO. 01-0321

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